

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

SARAH JANE BEAUGEZ

PLAINTIFF

VS.

CAUSE NO. 3:14-CV-00170-MPM-JMV

**THERAPY MANAGEMENT CORPORATION
AND TRISTAR REHAB, INC.**

DEFENDANTS

MOTION TO WITHDRAW AS COUNSEL

COME NOW Jim Waide, Ron L. Woodruff, and the law firm of Waide & Associates, P.A. and move this Court to allow them to withdraw as counsel for Plaintiff Sarah Jane Beaugez in the above-styled and numbered cause of action, and in support thereof would respectfully show unto the Court the following:

1. On December 17, 2014, Defendants in this case propounded discovery requests. (*See* Defendants' First Set of Interrogatories to Plaintiff and Defendants' First Set of Request for Production, attached hereto as Exhibits "A" and "B," respectively.)

2. As part of those requests, Defendants asked that Plaintiff execute certain medical records' authorizations.

3. Plaintiff refuses to execute those authorizations. Plaintiff's refusal to execute the authorizations has created irreconcilable differences between Plaintiff and her counsel, such that Plaintiff's counsel cannot continue to represent her.

4. For good cause shown, this Court should enter an order allowing Jim Waide, Ron L. Woodruff, and the law firm of Waide & Associates, P.A. to withdraw as counsel for Plaintiff in the above-styled and numbered cause, and further granting Plaintiff sixty (60) days, or such other reasonable

amount of time as the Court deems appropriate, from the date of the entry of such an order in which to employ the services of substitute counsel or to enter the case *pro se*.

5. If counsel is allowed leave to withdraw, subsequent filings should be directed to Plaintiff Sarah Jane Beaugez. Ms. Beaugez's contact information is as follows:

**Sarah Jane Beaugez
213 Halstead Road
Ocean Springs, MS 39564**

6. Because of the simple and self-explanatory nature of the instant motion, Jim Waide, Ron L. Woodruff, and the law firm of Waide & Associates, P.A. request that they be relieved of any obligation to file a supporting memorandum.

WHEREFORE, PREMISES CONSIDERED, Jim Waide, Ron L. Woodruff, and the law firm of Waide & Associates, P.A. hereby request that this Court enter an order allowing them to withdraw as counsel for Plaintiff Sarah Jane Beaugez in the above-styled and numbered cause of action and, further, granting Plaintiff Sarah Jane Beaugez sixty (60) days, or such other reasonable amount of time as the Court deems appropriate, from the date of the entry of such an order in which to employ the services of substitute counsel or to enter the case *pro se*.

RESPECTFULLY SUBMITTED, this the 2nd day of February, 2015.

By: /s/ Jim Waide
Jim Waide, MS Bar No. 6857
waide@waidelaw.com
Ron L. Woodruff, MS Bar No. 100391
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Tupelo, MS 38802-1357
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(662) 842-8056 / Facsimile

CERTIFICATE OF SERVICE

This will certify that undersigned counsel has this day filed the above and foregoing **Motion to Withdraw as Counsel** with the Clerk of the Court, utilizing the federal court electronic case data filing system (CM/ECF), which sent notification of such filing to the following:

Susan Fahey Desmond, Esquire
Jackson Lewis P.C.
650 Poydras Street, Suite 1900
New Orleans, LA 70130-7209
susan.desmond@jacksonlewis.com
NewOrleansDocketing@JacksonLewis.com
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kay.dipaola@jacksonlewis.com
theron.velazquez@jacksonlewis.com
rhonda.james@jacksonlewis.com

This will further certify that undersigned counsel has this day served a true and correct copy of the above and foregoing **Motion to Withdraw as Counsel** via electronic mail to the following counsel, who requires manual noticing:

Jessica L. Marrero, Esquire
Jackson Lewis P.C.
650 Poydras Street, Suite 1900
New Orleans, LA 70130-7209
jessica.marrero@jacksonlewis.com

This will further certify that undersigned counsel has this day served a true and correct copy of the above and foregoing **Motion to Withdraw as Counsel** upon Plaintiff Sarah Jane Beaugez via certified U.S. Mail, return-receipt requested, addressed as follows:

Sarah Beaugez
213 Halstead Road
Ocean Springs, MS 39564-5223

DATED, this the 2nd day of February, 2015.

/s/ Jim Waide
Jim Waide